

**CWA RECONNAISSANCE INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose: Compliance Evaluation Reconnaissance Inspection

Facility: Breese Site Hog Farm
19722 Low Bridge Road
Breese, Illinois 62230

NPDES Permit Number: None

Date of Inspection: May 20, 2011

EPA Representatives: Joan Rogers, Environmental Scientist 312-886-2785

State Representatives: None

Facility Representatives: FOIA Exemption (b) (6) Owner FOIA Exemption (b) (6)
FOIA Exemption (b) (6) Manager FOIA Exemption (b) (6)

Report Prepared by: Joan Rogers, Environmental Scientist 312-886-2785
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Report Date: June 27, 2011

Inspector Signature

A handwritten signature in cursive script, appearing to read 'Joan Rogers', is written over a horizontal line.

BACKGROUND

The purpose of this inspection is to evaluate and document the Breese Site Hog Farm's compliance with the interim measures required by the Administrative Order (Order), docket number V-W-10-AO-09, at its Breese, Illinois facility on May 20, 2011.

Breese Site is a swine operation in Clinton County, Illinois. [FOIA Exemption (b) (6)] leases the barns from MSSA Partnership. [FOIA Exemption (b) (6)] and [FOIA Exemption (b) (6)] are the partners of in the MSSA Partnership. The Breese Site is a swine finishing operation.

Following an EPA inspection on March 18, 2010, where discharges were documented, EPA issued the Order to Breese Site. On March 18, 2010, Breese Site was considered a large swine Concentrated Animal Feeding Operation (CAFO) due to the number of swine maintained on the facility. [FOIA Exemption (b) (6)] was ordered to eliminate all unauthorized discharges and apply for a National Pollutant Discharge Elimination System (NPDES) permit. The application for a NPDES permit requires the development of a Nutrient Management Plan (NMP) for the facility. [FOIA Exemption (b) (6)] has communicated through phone messages that actions have been taken to eliminate the discharges and that improvements to the facility have been completed. Since EPA was in the area on other business, it was arranged for EPA to perform an inspection at Breese Site to document the progress at the facility.

An Unnamed Tributary of Shoal Creek flows through the facility. The Unnamed Tributary flows eastward before flowing into Shoal Creek. The facility property ends at Shoal Creek. Shoal Creek is a water of the United States and it flows into the Kaskaskia River which flows directly to the Mississippi River. The Kaskaskia River and the Mississippi River are also waters of the United States. Shoal Creek is listed on Illinois' 303d list of impaired waterways as impaired for pathogens, nutrients and dissolved oxygen.

SITE INSPECTION

EPA arrived at the Breese Site at 9:30 A.M., put on disposable boots, and presented credentials. EPA began the inspection behind Barns #2 and #3. Cleanout pipes alongside the barns had previously discharged down the hillside to the east and into a storm water pond. Manhole cleanout structures between the barns identified the location of the manure line below ground. The furthest east manhole cleanout had previously overflowed and manure had discharged to the east down the hillside to the storm water pond.

On the date of this inspection, [FOIA Exemption (b) (6)] showed EPA the improvements that had been made to the area between the barns. [FOIA Exemption (b) (6)] had added rock and stone to the base of the barn walls to facilitate the draining of storm water. The ground between the barns had been graded and re-seeded. While doing this grading, [FOIA Exemption (b) (6)] discovered the terminus of a suspected storm water pipe and the ground around it was graded to allow the storm water to flow to the storm water pond. [FOIA Exemption (b) (6)] added extensions to the cleanouts alongside the building and capped the cleanout pipes to prevent the addition of clean water into the pits below the buildings. [FOIA Exemption (b) (6)] stated that he had identified that the reason that the furthest east cleanout had previously discharged was because it was lower in elevation than the pit below the barn. He has since added an

additional ring of concrete to raise the height of the furthest east manhole cleanout to prevent any overflows.



IMG_0282: Ground between barns has been graded and seeded.
Location: Between Barn #3 and Barn #4.
Facing: East
Date/Time: 05/20/11 9:30 A.M.



IMG_0284: Cleanout furthest east has had additional concrete pipe installed to prevent discharges. Previously, the cleanout was at a lower elevation than the barn pits. Now it is higher.
Location: Between Barn #3 and Barn #4.
Facing: East
Date/Time: 05/20/11 9:31 A.M.



IMG_0285: Level of manure in furthest east cleanout is low.
Location: Between Barn #3 and Barn #4.
Facing: Down
Date/Time: 05/20/11 931 A.M.



IMG_0286: Cleanout pipe along Barn #3 has been extended and capped to prevent the additon of storm water into the pit below barn.
Location: South of Barn #3.
Facing: Northwest
Date/Time: 05/20/11 9:33 A.M.



IMG_0287: Storm water pipe was found during regrading. Storm water pipe is identified by yellow circle.

Location: Northwest of Barn #4.

Facing: Southwest

Date/Time: 05/20/11 9:33 A.M.

EPA walked around the east side of Barn #3 and observed the Complex Lagoon. The Complex Lagoon receives manure from Barns #1-4. There was more than two feet of freeboard in the Complex Lagoon at the time of the inspection. [FOIA Exemption (b) (6)] stated that there were 1600 weaner pigs in Barn #1 and Barn #2, and there were 400 finisher hogs in Barn #3, for a total of 2000 animals. There were no hogs in Barn #4.

[FOIA Exemption (b) (6)] had repaired the valve casings for the pull plug valve on the north side of Barn #3 and the east side of Barn #1. He intended to regrade the ground on these sides of the barns as soon as the ground dried out enough to be workable to prevent the ponding of storm water on the north side of the barns.

EPA walked around the north side of the Complex Lagoon and then to the hillside east of Barn #3 and #4. The hillside had been graded and reseeded.



IMG_0288: Complex Lagoon has approximately two feet of freeboard.
 Location: Between Barn #3 and Complex Lagoon.
 Facing: West
 Date/Time: 05/20/11 9:34 A.M.



IMG_0293: Staff guage in Complex Lagoon shows two feet of freeboard.
 Location: Northwest corner of Complex Lagoon.
 Facing: South
 Date/Time: 05/20/11 9:40 A.M.



IMG_0290: Valve casing has been repaired.

Location: North of Barn #3.

Facing: East

Date/Time: 05/20/11 9:35 A.M.



IMG_0294: Hillside east of Barn #3 and Barn #4 has been regraded and reseeded.

Location: East of Barn #3 and Barn #4.

Facing: Northwest

Date/Time: 05/20/11 9:42 A.M.

EPA then walked down the driveway south of the storm water pond to observe Barn #5, Barn #6, and the 5-6 Lagoon. On the day of the inspection, there were only 100 hogs in Barn #5 and none in Barn #6. [FOIA Exemption (b) (6)] had installed a new piping system for Barns #5 and #6. Previously, the manure from Barn #5 flowed to a manhole where the manure from Barn #6 joined it. Now the manure from Barn #5 flows separately to the 5-6 Lagoon, passing through two manholes where the flow changes direction. The manure from Barn #6 now flows directly to the 5-6 Lagoon.

On the March 18, 2010 inspection, EPA documented that a break in the old pipe from Barn #6 allowed manure to discharge down the hillside to the north and to the wetland and Unnamed Tributary of Shoal Creek. This old pipe has been removed and the discharge to the north has been eliminated.



IMG_0299: Looking down into cleanout for reworked piping from Barn #5. [FOIA Exemption (b) (6)] dug up and replaced the piping for Barns #5 and #6. Barn #5 manure flows through pipe to first cleanout.

Location: North end of Barns #5 and #6.

Facing: Down

Date/Time: 05/20/11 9:46 A.M.



IMG_0300: Valve casing, denoted by yellow circle, for pull plug for Barn #5 by barn wall.

Location: First cleanout for manure from Barn #5.

Facing: West

Date/Time: 05/20/11 9:46 A.M.



IMG_0301: After exiting first cleanout, manure from Barn #5 flows to second cleanout north of Barn #6. Cleanout is denoted by yellow circle.

Location: North of Barns #5 and #6.

Facing: East

Date/Time: 05/20/11 9:46 A.M.



IMG_0302: Second cleanout for manure from Barn #5. Manure level is low.
 Location: North of Barn #6.
 Facing: Down
 Date/Time: 05/20/11 9:47 A.M.



IMG_0303: Manure from Barn #5 then flows directly to 5-6 Lagoon. Manure from Barn #6 flows directly to 5-6 Lagoon now. This location previously had a discharge from broken manure line.
 Location: North of Barn #6.
 Facing: East
 Date/Time: 05/20/11 9:47 A.M.



IMG_0304: Valve casing for pull plug for Barn #6.

Location: East wall of Barn #6.

Facing: Down

Date/Time: 05/20/11 9:47 A.M.

The 5-6 Lagoon had approximately five feet of freeboard on the date of this inspection.



IMG_0308: West berm of 5-6 Lagoon.

Location: Northwest corner of 5-6 Lagoon.

Facing: South

Date/Time: 05/20/11 9:48 A.M.



IMG_0316: Staff guage in 5-6 Lagoon shows approximately five feet of freeboard.
Location: South side of 5-6 Lagoon.
Facing: North
Date/Time: 05/20/11 9:53 A.M.

EPA then drove to the north along Low Bridge Road to observe Barn #7, Barn #8 and the two North Lagoons. A recent storm had collapsed the back section of Barn #7. FOIA Exemption (b) (6) blocked the line from Barn #7 from entering the West North Lagoon, since storm water was able to get in the pit below the barn. There were no hogs in Barn #7, due to the collapsed roof, and there were 1400 weaner pigs in Barn #8.

On the March 18, 2010 inspection, EPA observed a discharge from the pump out area of the West North Lagoon. Since then, FOIA Exemption (b) (6) has cleaned up the area around the pump out and extended the cleanout pipe for Barn #8 and capped it to prevent the addition of storm water into the pit below Barn #8.

Additionally, during the previous insepction, there was a discharge from the southwest corner of the West North Lagoon down the hillside to the Unnamed Tributary of Shoal Creek, due to the overfilling of the lagoon. On this inspection, there was approximately six inches of freeboard in the West North Lagoon. FOIA Exemption (b) (6) said that he intended to pump from this lagoon soon. Since there wasn't much storage capacity left in the West North Lagoon, EPA questioned FOIA Exemption (b) (6) about the level of manure in the pit below Barn #8. FOIA Exemption (b) (6) opened the door to Barn #8 and EPA observed that the level of manure was not at the top of the pit. FOIA Exemption (b) (6) stated that the pit was only three inches full.

During the walk around the West North Lagoon, FOIA Exemption (b) (6) stated that the East North Lagoon was not in use as a manure storage structure and he planned to leave it unused. He irrigates from this lagoon when it gets full.

The berms of both the East and West North Lagoons contained trees and woody growth. EPA stressed to **FOIA Exemption (b) (6)** that the trees and woody growth needed to be removed to preserve the integrity of the berms.



IMG_0326: Severe weather cause the collapse of part of Barn #7.
Location: South of Barn #7,
Facing: Northeast
Date/Time: 05/20/11 10:15 A.M.



IMG_0322: Cleanout for pipe from Barn #8 has been extended and capped. Land around the lagoon has been regraded.
Location: West of West North Lagoon.
Facing: Southeast
Date/Time: 05/20/11 10:12 A.M.



IMG_0324: West North Lagoon and staff guage.

Location: West side of West North Lagoon.

Facing: Southeast

Date/Time: 05/20/11 10:13 A.M.



IMG_0328: East North Lagoon is not connected to West North Lagoon. FOIA Exemption (b) (6) does not intend to use the East North Lagoon and irrigates from it when it is full. Note the trees growing on the side of the berm.

Location: Berm between West and East North Lagoons.

Facing: Southeast

Date/Time: 05/20/11 10:18 A.M.



IMG_0331: Woody growth on berm of West North Lagoon. FOIA Exemption (b) (6) was informed that the trees and woody growth needs to be removed.

Location: South side of West North Lagoon.

Facing: West

Date/Time: 05/20/11 10:22 A.M.



IMG_0333: Woody growth on berm of West North Lagoon.

Location: On berm between West and East North Lagoons.

Facing: East

Date/Time: 05/20/11 10:22 A.M.

EPA discussed requirement in the Order of the application of the NPDES permit, and subsequent development of a NMP. [FOIA Exemption (b) (6)] stated that he has applied for EQIP funding for the creation of the NMP. He stated that he was told that the National Resources Conservation Service (NRCS), the agency that grants the EQIP funds, was out of funds for this fiscal year and that he was on the list for funding next year. [FOIA Exe] [REDACTED] stated that he was intending to complete the rest of the paperwork that was required for the NPDES permit application during the summer.

EPA left the disposable boots in the garbage dumpster by Barn #8 and exited the facility at approximately 11:30 A.M. The odors on the facility were estimated to be at a level 0-1, on a scale of 1-10 (10 is worst) when upwind of the storage structures and barns and a level 2-4 when downwind. No samples were taken and for bio-security measures, the vehicle was washed in a car wash after the inspection.